

STEVENSON MARINO LLP

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July 16, 2021

Via ECF

The Honorable Peggy Kuo
United States Magistrate Judge for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Castillo v. Plaza Motors of Brooklyn, Inc. et al.*
Docket No.: 20-cv-4337-NGG-PK

Dear Judge Kuo:

We represent Plaintiff, Cely Castillo, in the above-referenced matter alleging discrimination claims against her former employers, Plaza Motors of Brooklyn, Inc., John Rosati, Adam Rosati, and Luis Simeoli (collectively as “Defendants”). We write now to respectfully request an extension of the parties’ deadlines outlined in the Court’s scheduling order dated June 8, 2021. *See* Electronic Order (June 8, 2021).

On June 8, 2021, the Court held a conference to address the issue of the authenticity of the arbitration agreement. As a result, the Court scheduled a deadline of July 28, 2021, for Plaintiff to produce a handwriting expert report to Defendants, as well as an August 9, 2021 deadline for the parties to complete limited discovery on the arbitration agreement authenticity issue. The Court additionally directed the parties to submit a status report by August 6, 2021 and scheduled a pre-hearing conference for August 9, 2021.

On July 8, 2021, Justin Marino and the undersigned filed notices of appearance on behalf of Plaintiff as our firm, Stevenson Marino LLP, will now be handling this matter as lead counsel. On that same day, we reached out to Defendants’ counsel to discuss Defendants’ outstanding discovery requests and on July 12, 2021, the parties held a meet and confer by telephone. During the call, the parties further discussed discovery issues and the scope of documents to be exchanged. As a result of the call, Defendants consented to an extension of the deadlines so that Plaintiff’s counsel has additional time to provide responses and prepare for Plaintiff’s limited-scope deposition and the Court’s hearing. Plaintiff agreed to produce responsive documents by July 30,

2021 and Defendants are to provide responses to Plaintiff's requests for production of documents by August 9, 2021.


Accordingly, Plaintiff respectfully requests a thirty-day extension of the deadlines outlined in the Court's June 8 Order. Plaintiff proposes the following dates:

Plaintiff to produce expert handwriting report by **August 27, 2021**;
Pre-hearing status report to be filed by **September 6, 2021**;
Discovery on the arbitration authenticity to be completed by **September 9, 2021**;
Pre-hearing conference to be held on **September 9, 2021, or a date scheduled by the Court.**

This is Plaintiff's first request for an extension of the discovery deadlines and Defendants consent to the extension of the foregoing deadlines.

We thank the Court for its time and attention to this matter.

Respectfully submitted,



Jeffrey R. Maguire, Esq.
For the Firm

C: Counsel for Defendants (via ECF)